

January 7, 2015

Jane Egan  
Montana Society of Public Accountants  
1534 Ninth Ave  
Helena, MT 59601

Re: Bill Draft Number: LC1393  
Short Title: Exempt certified public accountants from private investigator regulation

Dear Ms. Egan:

Summers McNea, P.C.  
80 25th Street West  
Billings, Montana 59102  
406.652.2320  
Toll-Free: 1.800.468.5333  
Fax: 406.652.2043  
www.summers-mcnea.com

My name is Seth Blades and I am a licensed certified public accountant located in Billings. My two other certifications include certified in financial forensics (CFF), as regulated by the American Institute of Certified Public Accountants (AICPA), and certified valuator and analyst (CVA), as regulated by the National Association of Certified Valuators and Analysts (NACVA).

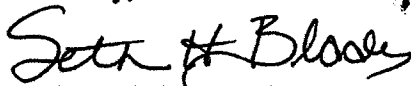
I am writing to offer my support for the above referenced bill number LC1393; "AN ACT CLARIFYING THAT CERTIFIED PUBLIC ACCOUNTANTS ARE EXEMPT FROM THE REGULATORY REQUIREMENTS OF PRIVATE INVESTIGATORS, PRIVATE SECURITY AND FIRE ENTITIES, AND PROCESS SERVERS WHEN ENGAGED IN AN INVESTIGATION INCIDENT TO THE PRACTICE OF ACCOUNTANCY; AND AMENDING SECTION 37-60-105, MCA."

As a CPA/CFF, CVA, I have already met, and exceeded, the criteria for being a private investigator (PI). To be CPA, one must graduate from a 4 year accredited college, pass a rigorous exam, and "must have one year (2000 hours) of acceptable accounting and auditing experience obtained within the three years preceding the date of application for licensure." To be a licensed PI, only a high school diploma or equivalent must be achieved and three years of experience. To keep my credentials current, I am bound by the State Board of Public Accountants to have a least 120 hours of continuing professional education with a subset of 2 hours in ethics in any rolling three-year period. For me, many of these hours must be business valuation or litigation support related to maintain my CFF and CVA. Whereas, no continuing education is required for PIs.

Based on the education and experience requirements, it is my opinion that attorneys, business owners and executives, and other stakeholders will want to hire an expert in accounting and finance as it deals with complex financial situations. By passing this legislation to precisely state that CPAs are exempt from PI licensure, it allows the roles of CPAs and PIs to be less ambiguous as it pertains to the business standards boards under the Montana Department of Labor and Industry and to others looking for help in their complex financial situation.

It is my hope that Montana will become a part of this growing trend to specifically exempt CPAs from PI licensing requirements. Please forward this letter to any legislature that you feel would benefit from this information to assist in their voting.

Sincerely,

  
Seth H. Blades, CPA/CFF, CVA  
Forensic Accountant